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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

CLEAR SKIES NEVADA, LLC,

Plaintiff,

v.

GRANT KAINU,

Defendant.

Case No.: 3:16-cv-00811-SI

**PLAINTIFF'S NOTICE OF
ACCEPTANCE OF DEFENDANT'S
FIFTH OFFER OF JUDGMENT**

Pursuant to Fed. R. Civ. P. 68, plaintiff, Clear Skies Nevada, LLC, by and through its undersigned counsel, provides notice that on June 15, 2018, it accepted Defendant's Fifth Offer of Judgment to Plaintiff dated June 4, 2018, including the attached Addendum – Injunctive Relief, attached hereto as Exhibit 1.

DATED: June 21, 2018.

HARRIS BRICKEN

By: s/ John Mansfield
John Mansfield, OSB No. 055390
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511 SE 11th Ave., Ste. 201
Portland, OR 97214
503-207-7313
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that on June 22, 2018, I caused to be served the foregoing PLAINTIFF'S
NOTICE OF ACCEPTANCE OF DEFENDANT'S FIFTH OFFER OF JUDGMENT upon
defendant's counsel by email and first class mail to the following address:

Thomas Freedman
Pearl Law LLC
522 SW 5th Ave., Ste. 1100
Portland, OR 97204-2128
thomas@prllaw.com

By: s/ John Mansfield
John Mansfield, OSB No. 055390
Attorneys for Plaintiff

Thomas Freedman, OSB No. 080697
Email: thomas@prllaw.com
PEARL LAW LLC
522 SW 5th Ave. Suite 1100
Portland, OR 97204
Phone: 503.295.6296
Counsel for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON - PORTLAND DIVISION

CLEAR SKIES NEVADA, LLC,

Plaintiff,

-against-

GRANT KAINU,

Defendant.

Case No. 3:16-cv-00811-AC

**FIFTH OFFER
OF JUDGMENT**

TO: Plaintiff, by and through John Mansfield, attorney for Plaintiff:

Pursuant to Fed. R. Civ. P. 68, defendant hereby offers to settle this matter and allow entry of judgment in favor of plaintiff and against defendant (i) in the sum of \$751.00, and (ii) \$400.00 for the cost of plaintiff's filing fee, and (iii) injunctive relief as set forth in the Addendum hereto, and (iv) reasonable, legally-recoverable costs and attorney's fees in this case, if any, to be determined by the Court pursuant to Fed. R. Civ. P. 54 and LR 54.

Dated: June 4, 2018

PEARL LAW LLC

By: /s/ Thomas Freedman
Thomas Freedman, OSB No. 080697
Attorney for Defendant

PLAINTIFF ACCEPTS DEFENDANT'S OFFER OF JUDGMENT /s/John Mansfield, plaintiff counsel

Addendum – Injunctive Relief

Defendant agrees to a permanent injunction enjoining defendant from infringing plaintiff's rights in plaintiff's motion picture including, without limitation, by using the internet to reproduce or copy plaintiff's motion picture, to distribute plaintiff's motion picture, or to make plaintiff's motion picture available for distribution to the public, except pursuant to a lawful license or with the express authority of plaintiff, and defendant shall destroy all unauthorized copies of plaintiff's motion picture in defendant's possession or under defendant's control.

Certificate of Service

I certify that on June 4, 2018, I served the foregoing FIFTH OFFER OF JUDGMENT upon plaintiff's counsel by email and first class mail to the following address:

Mr. John E. Mansfield
Harris Bricken
511 SE 11th Ave Ste 201
Portland, OR 97214
john@harrisbricken.com

By: /s/ Thomas Freedman
Thomas Freedman, OSB No. 080697
Attorney for Defendant